

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2004-1-E

IN THE MATTER OF:)	
)	
Carolina Power & Light Company)	
d/b/a Progress Energy Carolinas, Inc.)	INTERROGATORIES OF
Annual Review of Base Rates)	THE CONSUMER ADVOCATE
for Fuel Costs)	(Set No. 1)
_____)	

Pursuant to S.C. Code Ann. § 37-6-601 et. seq., (1989 and Supp. 2002), and 26 S.C. Code Ann. Regs. 103-851 (1976 and Supp. 2002), this party of record and Intervenor, Elliott F. Elam, Jr., Acting Consumer Advocate for the State of South Carolina, hereby serves these Interrogatories upon Progress Energy Carolinas, Inc. (Company) in Docket No. 2004-1-E and files the original and one (1) copy with the Honorable Bruce F. Duke, Executive Director of the South Carolina Public Service Commission.

IT IS HEREIN REQUESTED:

- A. That all information requested below, unless otherwise specified, be limited to the Company's South Carolina operations.
- B. That all information shall be provided to the undersigned in the format as requested.
- C. That all responses to the requests below be labeled using the same numbers as used herein.
- D. That if the requested information is found in other places or in other exhibits, reference not be made to those, but instead, that the information be reproduced and placed in the interrogatory response in the appropriate sequence.
- E. That any inquiries or communications relating to questions concerning clarifications of the data requested below be directed to the undersigned.

- F. That all exhibits be reduced to 8½" x 11" format.
- G. That the requested information be bound in ring binders (loose leaf notebook) or otherwise bound.
- H. That in addition to the signature and verification at the close of the Company's responses, the Company witness(es) or employee(s) responsible for the information contained in each answer be indicated.
- I. That each of these Interrogatories be reproduced at the beginning of each of the responses.
- J. That the Company provide the Consumer Advocate two copies of the responses to these Interrogatories as soon as possible, but no later than **March 5, 2004**.
- K. If the response to any Interrogatory is that the information requested is not currently available, state when the information requested will be available.
- L. These Interrogatories shall be deemed to be continuing so as to require the Company to supplement or amend its responses as any additional information becomes available.

General

- 1-1. Please provide copies of any Company correspondence and responses to oral or written data requests from any other parties (including Commission Staff) in this Docket.
- 1-2. Please provide a copy of the Company's FERC Form 1 for the last two years.
- 1-3. Please provide a copy of all exhibits, schedules and workpapers used to develop the 2004 filing.
- 1-4. Please provide a detailed analysis of monthly over/under recovery of fuel costs for the period under review.
- 1-5. For each month during the period under review, please provide a variance analysis of actual MWH sales and fuel costs with forecasted amounts used in the 2003 filing. In this response explain all variances greater than $\pm 5.0\%$.

- 1-6. Please identify and provide the amount of all wheeling costs including in the current filing.
- 1-7. Has the Company used or applied an avoided fuel cost proxy for purposes of this filing? If yes, please provide a comparison of actual and proxy fuel costs.
- 1-8. Please provide monthly and annual actual capacity factors by unit for the period under review.
- 1-9. Please provide all external auditor adjustments or adjustments required under GAAP, to fuel costs and fuel inventory relating to the period under review. In this response, indicate if the current filing reflects all such adjustments.
- 1-10. For each generating unit, please provide the following for each month for the period under review:
- (a) nameplate rating (MW);
 - (b) maximum output (MW);
 - (c) gross and net energy output (MWH); quantity of fuel consumed by type; and,
 - (d) cost of fuel by type.
- 1-11. For each month during the period under review, please provide the following:
- (a) net system generation (MWH);
 - (b) system purchases (MWH);
 - (c) MWH sales to retail customers (net of line losses) by state jurisdiction; and,
 - (d) MWH wholesale sales (net of line losses) by customer.

In this response, please reconcile any differences to the MWH amounts shown in Company's filing.

- 1-12. Does the Company have any real time pricing contracts in which energy charges are based on hourly fuel costs or hourly system lambdas? If the answer is yes, identify such contracts/customers and explain how these sales and fuel costs are treated for purposes of this filing.

- 1-13. Please provide a narrative description of any substantive changes to contracts for the purchase of all fossil fuels.
- 1-14. Does the Company purchase non-regulated fuel, fuel supplements, or transportation from any affiliate or entity in which Progress Energy has financial interest? If the answer is yes, please provide a copy of all contracts (affiliates and non-affiliates) for such fuel or supplements, and a comparison of monthly prices for the period under review.

Outages

- 1-15. For the period under review, please provide the following with respect to all forced outages lasting longer than 24 hours:
- (a) name of unit;
 - (b) dates and duration of outage;
 - (c) estimated net energy that would have been generated by the unit absent the forced outage;
 - (d) cause of outage;
 - (e) repair costs of outage;
 - (f) source(s) of replacement power;
 - (g) estimate or calculation of additional fuel and/or purchased power costs resulting from the outage with all supporting workpapers and documentation;
 - (h) copy of all correspondence and reports to and from all regulatory bodies (e.g. NRC); and,
 - (i) all orders or other correspondence setting forth any action by regulatory authorities.
- 1-16. For the period under review, please provide the following with respect to all scheduled outages lasting longer than originally planned:
- (a) name of unit;
 - (b) scheduled (planned) outage period;
 - (b) actual outage period;
 - (d) reason(s) for extended outage period longer than planned;
 - (e) estimate or calculation of additional fuel and/or purchased power costs resulting from the extended outage with all supporting workpapers and documentation; and,
 - (f) copies of all reports and correspondences concerning the extended outage or delayed start up.

- 1-17. What South Carolina retail over or under recovery would the Company have experienced through the past twelve-month period and be projecting through the next twelve-month period if any outages described in 15 and 16 had not occurred? Please provide workpapers and assumptions used with a complete narrative explaining each workpapers and assumption.
- 1-18. Please provide all outage and/or derating reports during the period under review.
- 1-19. Please provide the Company's scheduled outages for the next twelve months.

Purchased Power

- 1-20. Please provide a copy of all detailed purchased power invoices from all suppliers during the period under review.
- 1-21. For the period under review, please provide a schedule of power purchases that provides:
- (a) supplying party;
 - (b) total energy purchased (MWH);
 - (c) total energy price;
 - (d) fuel energy price (as available);
 - (e) capacity purchased (MW);
 - (f) capacity price & cost;
 - (g) FERC or state approved transmission charges;
 - (h) ancillary transmission charges;
 - (i) whether such purchase was on-peak or off-peak daily, weekly or monthly block purchase, e.g., 5x16, 1x16 or other similar product;
 - (j) whether energy purchased was take or pay;
 - (k) whether energy purchased was firm or interruptible; and,
 - (l) use of power (e.g. native load; off system resale, etc.).
- 1-22. Please provide the most detailed accounting (daily, weekly, or monthly) of the specific use for each purchased MWH retail, off-system sale, wholesale, etc., including the total MWH's and purchase price from each supplier for the period under review.

- 1-23. Regarding purchase and Interchange Power Costs, please provide all adjustments, revisions and/or true-ups to amounts originally booked, with an explanation for each change.
- 1-24. Please provide a list of all (a) long-term contracts and (b) short-term contracts to purchase fuel together with price, quantity and contract period.
- 1-25. Did the Company purchase any power from an affiliated supplier over the past twelve months? If yes, please provide name of supplier, purchase amount and dollars paid, and a description of any other consideration or service given or promised in exchange for this purchased fuel.

Off-System Sales

- 1-26. Please explain the Company's treatment of off-system sales fuel costs and margins in determining fuel recovery balances.
- 1-27. Please provide off-system sales (MWH) & related total energy revenue & capacity revenue for each month during the period under review.
- 1-28. Please provide invoices of all off-system sales, wholesale sales, and special contract sales during the period under review.
- 29. Please provide all revenues earned above cost to the Company from sales of power through interconnect agreements.
- 30. For the period under review, please identify the percentage of the Company's off-system sales attributable to fuel costs. Please provide Monthly Fuel Reports and any other supporting documentation used in determining that figure.

Forecasts

- 1-31. Please provide all analyses, spreadsheets, workpapers, etc. used to develop projected (forecasted) sales, and cost of fuel (energy and capacity as appropriate) for purposes of this filing. In this response, provide all coefficients, parameters, and diagnostic statistics.

Capacity Related Costs

- 1-32. Does this filing reflect the General Assembly's 2003/2004 amendment to Section 58-27-865(A)? If yes, specifically explain and identify all changes or modifications to previous recent filings.
- 1-33. If this filing includes costs resulting from recent amendments to Section 58-27-865(A) that are also included in base rates, quantify these amounts and explain the Company's proposal or plan to ensure no double recovery of such amounts.
- 1-34. If this filing includes any capacity related costs, explain and provide all details relating to the assignment or allocation of these capacity costs to South Carolina for purposes of this filing.

Elliott F. Elam, Jr.
Acting Consumer Advocate

Hana Pokorna-Williamson
Staff Attorney

By: _____
S.C. Department of Consumer Affairs
3600 Forest Drive
Post Office Box 5757
Columbia, S.C. 29250-5757
(803) 734-4189

February 24, 2004

CERTIFICATE OF SERVICE

This is to certify that I, Elliott F. Elam, Jr., have served this day the foregoing **Interrogatories of the Consumer Advocate (Set No. 1)** upon the persons named below, at the addresses set forth, by deposit in the United States mail, postage prepaid.

Len S. Anthony, Esquire
Progress Energy Services Company
P.O. Box 1551 / PEB 17A4
Raleigh, NC 27602-1551

Scott Elliott, Esquire
Elliott & Elliott, P.A.
721 Olive Street
Columbia, SC 29205

February 24, 2004
Columbia, South Carolina